



# **London College of Business Studies**

## **PREVENT POLICY & PROCEDURE**

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## **Introduction**

This policy was formulated in response to HM Government Prevent Duty Guidance for Higher Education Colleges in England and Wales. This guidance is annually reviewed and updated in accordance with any changes to the Prevent Duty Guidance for England and Wales, and the 'Prevent duty guidance: for higher education institutions in England and Wales, updated by the department and is the subject of the duty under Section 26 of the Counter-Terrorism and Security Act (CTSA) 2015 which applies to specified authorities including schools and colleges.

According to the government and security services, the UK is 'likely' to be confronted with terrorist attack. The threat level has been 'severe' at times but currently stands at 'Substantial' and irrespective of the threat level, the College aims to have an effective prevent policy and procedure in place for it to be able to play its part in the reduction of such risks. Media reports of young people leaving their studies to become involved in terrorism, either here in Britain or overseas, have led to increased concerns about radicalisation and extremism in the Higher education sector.

Higher education and skills providers have been placed under a legal duty to have 'due regard' to the risk of learners being drawn into terrorism. The government issued specific guidance that clarifies what it expects higher education providers to deliver to comply with this duty. The 'Prevent' duty guidance makes clear the important role of higher education leaders in stopping extremists seeking to radicalise learners on campuses and in supporting learners at risk of extremist influences.

- Are providers ensuring that external speakers and events are appropriately risk assessed to safeguard learners?
- Are the partnerships between different agencies effective in identifying and reducing the spread of extremist influences?
- Are providers assessing the risks that their learners may face, and taking effective action to reduce these risks?
- Are learners being protected from inappropriate use of the internet and social media?
- To what extent are staff training and pastoral/welfare support contributing to learners' safety?

## **1. Leadership, Direction and Process**

London College of Business Studies (The College) acknowledges and accepts its legal duty to have due regard to the risk of people being drawn into terrorism. It also believes that individuals

being drawn into terrorism is a form of harm and accepts the obligations arising from the Prevent legislation as an important element of its general duty to protect its staff and students from all forms of harm. This means that our prevent policy will not only protect our staff and students from individuals that are likely to draw them into extremism but will also help any individuals that may have already been drawn into extremism and need guidance and support.

1.1 The College must balance the requirements of Prevent with its core belief that the cultural religious and ethnic diversity of students and staff should be celebrated.

1.2 The College must also meet its legal and moral obligation to allow and promote academic freedom and free speech which are vital elements of a successful community of students, Lecturers and all other staff who support them. All of this has to be done within the obligations of prevent and should not in any way result into a breach of the prevent duty.

1.3 Depending on the scale of operations, the College will be carrying out a wide-ranging risk assessment to determine its capacity to prevent the possible risks of radicalisation or involvement in extremist activity.

1.4 The Board of Trustees will ensure that they adopt an active role in the implementation of the duty, by arranging the training (Prevent Awareness Training and other Training) of appropriate staff, wide dissemination of the policy and the responsibilities related to it and allowing for an effective and efficient liaison between the College and other concerned bodies such as the Police, OfS and related prevent co-ordinators.

1.5 A single point of contact, the Prevent Officer, will be appointed in order to ensure that all stakeholders are aware of who to get in touch in relation to the duty. The officer should be a person with authority and who is able to make use of the authority whenever required in order to allow for a smooth implementation of the duty. The College plans to have the Head of Academics as the Prevent Officer. The Prevent Officer will take majority of the responsibility in facilitating the implementation of the Policy.

1.6 The policy will be made available and communicated publicly through all forums (learner portal, website, handbooks etc) to students and staff in order to ensure that this is understood and also reviewed effectively in response to feedback from staff and students and any issues that may have come into light.

1.7 The College will keep a close eye on the content and the person responsible for sharing content on its social media pages and Learner Portal to ensure no extremist views are expressed or no such forums are created that draw other students into terrorism.

1.8 The College will incorporate information and discussion on Prevent Duty during staff and student induction.

## **2. Teaching and Learning**

The College ensures that the teaching and learning activities are monitored in order to ensure these are performed in accordance with the College's obligation towards Prevent Duty.

2.1 College promotes British Values such as equality, diversity and inclusion, wellbeing and community cohesion throughout the College through its policies and procedures.

### **2.1 (a) *Promoting British Values***

A key part of our plan for training and education is to ensure we develop our learners in order to become valuable and fully rounded members of society who treat others with respect and tolerance, regardless of background.

We want our courses and programmes in the UK, to promote the basic British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance for those of different faiths and beliefs.

This ensures our learners understand the importance of respect and are helped to become prepared for life in modern Britain.

Examples of the understanding and knowledge learners are expected to learn include:

- an understanding of how citizens can influence decision-making through the democratic process
- an understanding that the freedom to hold other faiths and beliefs is protected in law
- an acceptance that people having different faiths or beliefs to oneself (or having none) should be accepted and tolerated, and should not be the cause of prejudicial or discriminatory behaviour
- an understanding of the importance of identifying and combatting discrimination and radicalisation

Examples of actions we take to promote British values are to:

- include in suitable parts of a scheme of work - as appropriate for the age group - material on the strengths, advantages and disadvantages of democracy, and how democracy and the law works in Britain, in contrast to some other countries
- ensure all learners on our courses have a voice that is listened to, and demonstrate how democracy works by actively promoting democratic processes e.g. through our student feedback collected, Appeals procedure, and the Prevent and Welfare policy.
- use opportunities to promote fundamental British values and provide learners with the opportunity to learn how to argue and defend points of view e.g. conflict management and communications skills, through discussions in classes

- develop inter-personal and team working skills to encourage our learners to behave with tolerance and mutual respect of others and thereby adopting a duty of care. This can be done through group projects and presentations during lectures
- promote the personal contribution individuals can make to a healthy, thriving society through positive attitude, communication and action.

2.2 The teaching material handed out or shared through the student portal is scrutinised for relevance to the programmes being offered and its content is reviewed for existence of any extremist aspects.

2.3 The lecturers are required to submit copies of the lesson plans, which contain contents being delivered, for every lesson to the Head of Academics for review.

2.4 The Academic Team also conducts lesson observations and peer observations to review and monitor the teaching and approaches being used by the tutors.

2.5 Students are also encouraged to report any suspected extremist related teaching content through their student representation or directly to the Prevent Officer or Student Welfare Officer.

### **3. All Staff**

All staff at the College have a responsibility to create and support an ethos that upholds the College's mission, vision and British Values, to create an environment of respect, equality and diversity and inclusion.

All staff members must take steps to understand the Prevent duty for it to be implemented and in order to be aware of the skills to recognise those who may be vulnerable to radicalisation, involved in violent or non-violent extremism, and to know the appropriate action to take if they have concerns.

They must report any concerns around extremism or radicalisation to the Prevent Officer or the Prevent coordinator in case the concern relates to the management of the College. Staff should take active steps to report and remove any literature displayed around the College that could cause offense or promote extremist views. All staff members will support the development of learner understanding of the issues around extremism and radicalisation. For this reason, it is also very important for staff to actively participate in any prevent training conducted or arranged by the College.

### **4. Training**

The College provides Prevent Duty related training to its staff members annually. Prevent duty is also a part of the College's induction process for all new staff members and a section on

Prevent Duty is included within the Staff Handbook. Learners are also given an induction on the Prevent Duty. To ensure that the training is fit for purpose, the College uses the entire DfE model for training of the staff members and also uses the online prevent training available at the Gov.uk website. All Trustees and Senior Management Team also undergo the same training annually.

## **5. Signs of Radicalisation**

Radicalisation can happen both in person and online.

Everyone is different, and there is no checklist that can tell us if someone is being radicalised or becoming involved in terrorism. But these signs may mean someone is being radicalised:

- accessing extremist content online or downloading propaganda material
- justifying the use of violence to solve societal issues
- altering their style of dress or appearance to accord with an extremist group
- being unwilling to engage with people who they see as different
- using certain symbols associated with terrorist organisations

## **6. Process**

All staff members have the responsibility of discharging the Prevent Duty and are expected to take a proactive approach in the identification and referral of Prevent related concerns.

In general, when a concern is identified, the notice, check, share procedure should be applied as outlined in the Prevent duty GOV.UK awareness course. This is summarized as follows:

**Notice:** Those who work in frontline support roles will often be the first to notice if someone displays concerning behaviour, like the signs of radicalisation outlined in this policy above. If you notice behaviours that cause you concern, then you may want to consider whether the person is susceptible to radicalisation.

There could be many different reasons for these behaviours, not just radicalisation. It's important to understand the context, and why these changes are happening, before jumping to any conclusions.

**Check:** You may wish to discuss your concern organisationally, with the person responsible for safeguarding, such as the Prevent Officer. Checking before sharing a concern is a way of making sure you have gathered as much relevant information as possible before making your referral.

Share: Once you have gathered the relevant information, it is essential to share a concern and make a referral to the police using the Prevent national referral form. In some cases, you may do this directly. Sometimes, where appropriate, the organisational prevent lead or equivalent, or the local authority may do this on your behalf.

The above procedure is supported by the following internal and external processes:

- a) Internal Process: The College has an appointed Prevent Officer and all staff members who have a Prevent related concern for a student or another staff member, should report it to the Prevent Officer. The details of the Prevent Officer are at the end of the Policy.

The below will be followed;

- Member of staff identifies a concern related to a vulnerable individual and reports to the College's Prevent Officer. Please refer to the Guidance to Behaviours in Appendix A.
  - The Prevent Officer gathers more information and speaks to the individual where possible
  - If concern is legitimate then the Prevent Officer makes an external referral by following the external process outlined in (b) below
  - If there is no concern then a referral is not made.
  - The Prevent Officer will also arrange to speak to the relevant DfE/OfS PreventCoordinator to obtain further advice.
- b) External Process: The External Referral Process is mainly related to the Channel referral.
- When it is identified that a concern regarding a vulnerable individual is serious then the Prevent Officer will follow the external referral process and it will be considered to have entered the Channel process at this stage.
  - The College will try and obtain further evidence and information from other key agencies that the individual may be involved with to identify any shared concerns between agencies.
  - The College will contact the local police and the Channel lead at the local council of where the vulnerable individual resides. A referral to the local authority or police (depending on the local process) will be made; the local authority would organise Channel.
  - Police will organise a Multi-Agency Channel meeting which will be made of key partners. The meeting will be chaired by the local authority.
  - Depending on the level of risk, the agencies will devise a support plan
  - Process is regularly reviewed and Channel Panel members work together to review the progress and reduce risk
  - The individual will exit the Channel process when all partner agencies feel that the vulnerability to radicalisation has been completely removed or significantly lessened

- Once a referral has exited the process, it will be reviewed at 6 and 12 months. If concern remain, the individual can be re-referred

## **7. Risk Assessment**

College will conduct risk assessment in response to its Prevent Duty. The risk assessment will aim to assess;

- where and how the students might be at risk of being drawn into terrorism (violent or non-violent extremism)
- College's Policies related to Student Welfare and Equality and Diversity to ensure these are fit for purpose and invite an inclusive environment for students and staff to understand and accept differing cultures and customs
- If applicable, assess the risk of having any expected external speakers that may possess any extremist views
- If applicable, assess the risk of any expected events that may facilitate the sharing of extremist views
- If applicable, assess any events that may be held externally to ensure that any extremist views or influences are not held at through the event. Review the partnership arrangement with any other bodies in order to assess that these do not in any way constitute to a risk of learners or staff being drawn into terrorism or represent the College as being associated with any such groups.

## **8. Action Plan**

The College will also devise an action plan in response to the identified risks and all efforts will be made to minimise the risks.

## **9. Code of Practice for Ensuring Freedom of Speech within the Law**

Freedom of expression and equality are foundational rights, whose realisation is essential for the enjoyment and protection of all human rights. The College believes that freedom of expression and academic freedom are vital to the academic success and must be fully reflected in both its policies and practices.

Our approach is to enable and promote free speech and encourage debate of all kinds. The only exception is where there are serious concerns about public disorder or the direct incitement of violence or hatred.

This means that there must be an atmosphere of free and open discussion. The College supports the view of the European Court of Human Rights that freedom of expression



constitutes one of the essential foundations of a democratic society and that such freedom is applicable not only to information or ideas that are favourably received, but also to those that have the potential to offend, shock or disturb the listener. Staff and students primarily determine the subjects and topics of discussion that take place on campus. Pluralism, tolerance and broadmindedness are essential components of a democratic society, and all views, including those that can be difficult to hear, should be able to be expressed and heard with tolerance and mutual respect.

The College supports the right to hold conferences and talks on controversial topics. There is freedom to challenge or debate the law, moral or other issues but this does not give permission to break the law.

The principle of free speech has the potential to be abused, including through incitement to violence or to breaches of the peace, or by the use of threatening words or behaviour (including the display of writing, signs or other visible representations) which are intended to provoke racial or religious hatred or hatred on grounds of sexual orientation, or to encourage or draw people into terrorism.

All of our staff and students have a responsibility to consider these issues in the course of their work.

As an institution, the College is mindful of its responsibilities to ensure that its premises are not being used for unlawful purposes, including those which may negate the enjoyment of that freedom for others.

When permitting its premises to be used, the College must therefore consider what may be said. This is also reflected through the External Speakers and Events section below.

The College is not obliged to allow its premises to be used by members of the public or by organisations which might wish to do so, nor is it obliged to admit members of the public to meetings taking place on its premises (providing that it does not exclude on a discriminatory basis) and must take account of other legal obligations, including those around the bounds of lawful speech and assemblies that may lead to serious disorder or breaches of the peace.

## **10. External Speakers and Events**

The College considers the extent to which any external speakers and events held on its premises pose a risk of radicalising learners into terrorism. The College needs to balance its legal duties in terms of both ensuring freedom of speech and academic freedom, and also protecting student and staff welfare. Encouragement of terrorism and inviting support for a proscribed terrorist organisation are both criminal offences. The College must not provide a platform for these offences to be committed

The College has a special role in promoting and encouraging vigorous debate, free speech and freedom of enquiry within the law. Protection of **academic freedom** recognises that academic staff have the right to explore unpopular or controversial subjects and opinions in their teaching even though students may find them challenging or unpalatable. The College emphasises on and endorses the fact that Academic freedom is the legal right, originally established by the 1988 Education Reform Act, of staff in the UK 'to question and test received wisdom and to put forward new ideas and controversial or unpopular opinions without placing themselves in jeopardy of losing their jobs or the privileges they may have'. Academic staff must, however, ensure that their teaching delivery does not discriminate against or cause harassment of any student on the grounds of their age, disability, ethnicity, gender reassignment, pregnancy and maternity status, religion and belief, sex, or sexual orientation.

At present the College does not invite external speakers to its events or for any workshops for learners. The College also does not hold any events externally. However, in such cases the following will apply;

Staff and students who wish to organise events that involve external speakers are responsible for notifying the College of the intended speakers. They are also responsible for ensuring requests are made with sufficient notice to allow the College to assess any potential risk relating to the event and make arrangements to mitigate this.

The College will also seek to ensure that external speakers and events do not provide a platform for the encouragement of terrorism or invite support for a proscribed terrorist organisation. The College will ban an external speaker or cancel an event if, in the view of the Prevent Duty, there is a significant risk of the College committing a criminal offence by allowing the external speaker to speak and/or the event to proceed. The College will discharge this duty by assessing the affiliations, links and history of the speakers and also by requesting a transcript of any speech to be delivered in advance of the event.

## **11. Reporting of Potential Serious Incidents or Material Changes to OfS**

As a registered provider, the College is also required to submit notification of any serious incidents or material changes to the OfS as a reportable event.

Potential Serious Incidents: may include any incidents or developments which:

- have led to the review and substantive revision of Prevent-related policies
- have caused reputational harm or harm to staff or students
- could be reasonably perceived as being related to Prevent
- This would not cover business as usual (for example, straightforward Channel referrals or informal contact with the police or local Prevent partners).

Material Changes: There are 5 categories of material change which are expected to be reported to the OfS

- a. Significant changes to policies or processes relating to the Prevent duty as previously assessed by the OfS (for example, a significantly changed welfare or information technology policy, or a major revision to a process for managing external speakers and events).
- b. Changes of responsibility for Prevent (for example, appointing a new Prevent lead).
- c. Changes of control (for example, new governance structures which change the oversight of the Prevent duty).
- d. Changes to location (including addition of a new campus).
- e. Changes to teaching provision (for example from online to face-to-face provision, any changes to curriculum that may have an impact on Prevent-related policies, such as security-sensitive research policies for example, or significant changes to partnership arrangements, e.g. subcontractual teaching arrangements, that may impact upon Prevent related considerations)

## **12. Review and Monitoring**

The policy will be reviewed annually and on an ad-hoc basis if required.

### **Useful Contacts**

Prevent Officer – Mr Asad Sarwat  
[asad@lcbs.co.uk](mailto:asad@lcbs.co.uk)

## Appendix A – Behaviour Barometer

### INSIGNIFICANT BEHAVIOUR

This category includes a series of behaviours associated with diverse forms of political, religious or community engagement, which are characterized by peaceful actions and democratic means of expression.



- + Argues fervently to defend his/her convictions before family members and/or close friends
- + Adopts visible signs (traditional clothes, beard, shaved head, religious symbols, specific tattoos, etc.) to express his/her identity or sense of belonging
- + Is active on social media
- + Takes a stand and campaigns peacefully for a cause related to a community, a group or an individual
- + Takes a keen interest in current national and international events
- + Expresses the desire to reintegrate or to increase involvement in a religious practice, or an identity or political engagement
- + Converts or adopts new religious, ideological or political beliefs
- + Insists on following specific dietary requirements due to political or religious convictions
- + Expresses a need for excitement or adventure
- + Displays a desire to correct social injustices

### TROUBLING BEHAVIOUR

This category includes individual behaviours that attest to personal ill-being. It also includes behaviours that represent an increasingly sustained self-identification with a cause or an ideology that leads the individual to significantly change his or her behaviour.



- + Expresses polarizing views of absolute truth, paranoia or extreme mistrust
- + Adopts behaviour which creates a rupture with family practices
- + Is drawn to conspiracy theories and discourse
- + Begins to isolate himself/herself from family and/or friends
- + Suddenly changes his/her habits
- + Feels a sense of victimization and rejection
- + Insistently preaches religious and ideological ideas to others
- + Rejects the rules and regulations of institutions and organizations with which one is in contact (school, workplace, athletic organizations, etc.) based on ideological, political or religious grounds.
- + Refuses to take part in group activities or interact with certain individuals due to the latter's religion, race, skin colour, gender or sexual orientation
- + Expresses a need to dominate or control others
- + Has difficulty reassessing one's own ideas and/or recognizing the value of other points of view

### WORRISOME BEHAVIOUR

This category encompasses behaviours that can be associated with the beginning of an individual's engagement in a radical trajectory. It is characterized by an acute mistrust of the outside world, and by a preponderance of views legitimizing the use of violence to achieve one's goals, or to win a cause.



- + Cuts off ties with family members and/or close friends in order to keep exclusive company with a new circle of acquaintances or friends
- + Legitimizes the use of violence to defend a cause or an ideology
- + Hides a new lifestyle, allegiance or belief system from family members and/or close friends (either online or in real life)
- + Becomes closer to individuals or groups known to be violent extremists
- + Becomes suddenly disinterested in professional or school activities
- + Displays symbols of affiliation or support associated with recognized violent extremist groups
- + Becomes obsessed with the end of the world or with messianic views
- + Expresses hateful views towards other individuals or groups

### ALARMING BEHAVIOUR

This category includes a variety of behaviours that attest to an exclusive and sectarian allegiance to an ideology or a cause, which lead the individual to perceive violence as the only legitimate and valid means of action.



- + Takes part in violent extremist group activities by any means whatsoever (material, financial or physical)
- + Recruits individuals for a violent extremist cause (or encourages their enlistment to that cause)
- + Is in contact with a group or a network of individuals known to be violent radicals, either online or in real life
- + Reinforces own beliefs through regular consultation of violent extremist Internet forums and websites
- + Commits or plans violent or hateful acts inspired by ideological motives or a violent extremist cause
- + Learns about, seeks to acquire or knows how to use weapons (firearms, explosives, etc.) outside the legal bounds
- + Plans a trip to a conflict zone or to a region in which violent extremist groups are known to be active

## **Using the Behaviour Barometer Correctly**

The Behaviour Barometer is a tool designed to provide a simple visual representation of behaviours that could be indicators of radicalisation. The Barometer is divided into four categories based on the level of seriousness: insignificant, troubling, worrisome and alarming.

The behaviour barometer is a teaching tool, there to help you identify behaviours associated with radicalisation and violence if you are concerned about a student, friend or colleague.

It's by no means a screening or detection tool, but it is there to help you think clearly. Not all behaviours of a person will fall under the same category. It might be the same that an individual's behaviour sits under several different categories. So, it's important to use the tool as a qualitative way to assess the situation. It should help you examine which behaviours are the most significant, in context to the individual's overall behaviour.

The intention behind the tool is not for us to attempt to determine a category by assessing quantitatively. Consider other factors. Some behaviours listed in the barometer, when looked at independently, can be symptoms of other issues and may be unrelated to radicalisation. For example, an individual may be suffering from mental health related problems. So, we should always consider context and other explanations for behaviours.